

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS**

**In re:**

**GREENHUT, Andrew  
SS# xxx-xx-2515  
Debtor**

**Chapter 13  
Case No. 19-10782-JNF**

**TRUSTEE'S OBJECTION TO CONFIRMATION OF DEBTOR'S AMENDED  
CHAPTER 13 PLAN**

Now comes Carolyn Bankowski, Standing Chapter 13 Trustee ("Trustee"), and respectfully objects to confirmation of the Debtor's Amended Chapter 13 Plan, (the "Plan"), and for reasons says as follows:

1. On May 1, 2019, the Trustee convened the §341 meeting of creditors at which the Debtor was present with counsel. The Trustee cannot recommend the Plan for confirmation.
2. In Part 5.A, the Debtor lists general unsecured claims in the sum of \$385,787.24, however under the Total Nonpriority Unsecured Claims the Debtor lists \$387,343.93. The Plan is inconsistent.

WHEREFORE, the Trustee requests that the Court sustain the objection to confirmation and grant such other relief as is proper.

Dated: May 6, 2019

Respectfully submitted,  
By: /s/ Carolyn Bankowski  
Carolyn Bankowski, BBO#631056  
Patricia A. Remer, BBO#639594  
Standing Chapter 13 Trustee  
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**Certificate of Service**

The undersigned hereby certifies that on May 6, 2019, a copy of the Trustee's Objection to Debtors' Chapter 13 Plan was served via first class mail, postage prepaid or by electronic notice on the debtors and debtors counsel at the addresses set forth below.

Andrew Greenhut  
21 Kingston Street  
Somerville, MA 02144

Richard N. Gottlieb  
Law Offices of Richard N. Gottlieb  
Ten Tremont Street  
Suite 11, 3rd Floor  
Boston, MA 02108

/s/ Carolyn Bankowski